

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

Ex. 2

MICHAEL AND SHELLIE GILMOR,
et al.,

Plaintiffs,

vs.

PREFERRED CREDIT CORPORATION,
et al.,

Defendants

Case No. 10-0189-CV-W-ODS

DECLARATION OF CHRISTI GUMBS

Christi M. Gumbs declares the following:

1. My name is Christi M. Gumbs. I am over 18 years of age and work as a legal assistant for Walters Bender Strohbehn & Vaughan, P.C.
2. I am one of the legal assistants assigned to work on the Gilmor class action litigation.
3. I am submitting this declaration in support of *Plaintiffs' Suggestions in Opposition to Daubert Motion of Defendants Litton Loan Servicing L.P. and JPMorgan Chase Bank, National Association, as Former Trustee, To Exclude Expert Testimony* and in support of *Plaintiffs' Joint Suggestions in Opposition to Daubert Motion of Defendants LaSalle National Bank, Wilmington Trust Company and Wendover Financial Services, To Exclude Expert Testimony*.
4. As a legal assistant assigned to work on this case, I am, among other things, familiar with how a list of loans that were originated by Preferred Credit Corporation ("PCC") in Missouri was compiled.
5. In order to ascertain what loans existed in Missouri, Walters Bender Strohbehn &

Vaughan, P.C. directed that record searches be done in all Missouri Counties prior to filing this action to determine what the records reflected as to loans that were originated by PCC.

6. The records generally obtained from these searches are bates numbers GvPfd 00633-1875, 12381-12557, 13030-18200, 17191-18200, 18218-18241, which have all been produced to the Defendants.

7. All loans that were uncovered during the record searches were included in the Gilmore class action litigation when it was filed.

8. After this case was filed, additional loans were added to the class, as various Defendants identified loans that had not been discovered in the county searches that were previously performed.

9. The total number of loans discovered through the record searches and subsequently identified by Defendants totaled 519 loans.

10. However, the class members for a total of four loans timely opted out of the litigation class certified in this case. Thus, there are a total of 515 PCC Missouri second mortgage loans at issue, given the opt-outs.

11. I am not aware of any Missouri PCC originated loans, other than those discovered through the record searches or later identified by Defendants.

12. As a legal assistant assigned to work on this case, I have, also among other things, directed and assisted with entering data from the 515 loan files into the "Fee Line Database." All available data from the 515 loan files was entered into the fee line database.

13. I have also cross-checked the information and data contained on the "Fee Line Database" that Plaintiffs prepared and provided to Plaintiff's expert, Dr. Kurt Krueger, with the Notes, Settlement Statements, public filings, spreadsheets, data warehouse, and other documents

that Plaintiffs have been able to obtain to date. The Fee Line Database provides in an electronic format all of the loan data currently available for the Gilmore Missouri second mortgage loans that PCC made.


14. I, and persons under my direction, have personally reviewed all of the information and documents described in the preceding paragraph and have analyzed the same for purposes of this case.

15. I and persons under my direction have contacted and attempted to contact those class members for whom Defendants did not produce a loan file or other documents for the PCC loans they owned and/or serviced. Plaintiffs have attempted repeatedly to obtain such missing fee or other loan data, but to date have been unable to do so from the class members or public filings.

16. The foregoing statements are true and correct and are based on my personal knowledge, my personal review and analysis of Defendants' discovery responses and documents, and of the documents produced, on the affidavits of the Named Plaintiffs, or on the knowledge of the various attorneys and/or legal assistants who performed portions of the above analyses with or before me.

I, Christi M. Gumbs, do hereby verify and declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing statements are true and correct and are based on my personal knowledge and my personal review and analysis of the above-referenced loan files and other documents.

Dated: September 27, 2012


Christi M. Gumbs